

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN (BALTIMORE) DISTRICT OF MARYLAND**

DAVID J. BOSHEA

Plaintiff,

v.

COMPASS MARKETING, INC.

Defendant.

Case No. 1:21-CV-00309-ELH

* * * * *

CONSENT MOTION TO EXTEND TIME TO ANSWER COMPLAINT

Defendant Compass Marketing, Inc. (“Compass Marketing”), both through its undersigned counsel, hereby files this Consent Motion to Extend Time to Answer Complaint and states the following in support hereof.

On or about April 30, 2021, Compass Marketing learned of the Complaint and Motion for Default Judgment filed by Plaintiff David J. Boshea (“Boshea”). Compass Marketing shortly thereafter learned that an adverse party in another lawsuit appears to have received notification of the Complaint and Motion for Default Judgment from Compass Marketing’s Registered Agent and did not inform the company of these matters. Upon learning this information, Compass Marketing promptly retained counsel, and counsel for Compass Marketing promptly reached out to counsel for Boshea, explained what the company had learned, and requested a 21-day extension of time to answer the Complaint. Counsel for Boshea consented to the 21-day extension.

WHEREFORE, Compass Marketing respectfully requests, with the consent of Boshea, that the Court grant Compass Marketing an extension of time until May 26, 2021, to answer the Complaint (and also deny the Motion for Default Judgment as moot).

Dated: May 4, 2021

Respectfully submitted,

/s/ Stephen B. Stern

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*Counsel for Defendant
Compass Marketing, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of May, 2021, this Consent Motion to Extend Time to Answer Complaint was served via CM/ECF to:

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David Boshea

/s/ Stephen B. Stern
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